



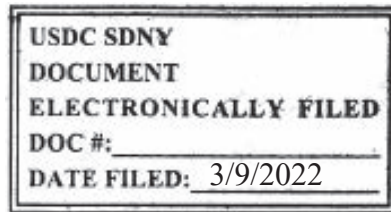
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Via ECF

Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007



March 7, 2022

Re: *Anshuman Bhatia v. City of New York, et al.*, 21 -CV-08363 (AJN)(JLC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I write on behalf of the City and plaintiff in response to the Court's Order of March 4, 2022 directing the parties to submit their proposed case management plan and joint letter by March 7, 2022.

The City and plaintiff have conferred and agree that the most efficient means of resolving this matter is to attempt to reach a settlement before embarking on litigation costs and burdens that may prove unnecessary. Counsel expect to be engaged in settlement discussions over the next month and hope that, with the participation of the individual defendants, the matter could be resolved during that time. In addition, the adjournment of the pending deadlines and conference will allow additional time for the individual defendants (none of whom will be represented by this Office) to obtain their own counsel, appear in this matter, and participate in any settlement discussions.

Accordingly, the parties respectfully request that the Court hold this matter in abeyance for thirty (30) days from today, until April 6, 2022, adjourning *sine die* the initial conference; the date for submission of their proposed case management plan and joint letter; and the time for defendants to answer or otherwise respond to the complaint. This office and counsel for the plaintiff propose that, on April 6, 2022, they would write to the Court regarding the status of settlement discussions, and whether the parties wish to propose a schedule for further litigation or request a settlement conference.

SO ORDERED.

3/8/2022

This is the second request for extension of the time for the initial conference and the fifth request for extension of the time to respond to the complaint. The prior requests were granted upon consent.

We thank the Court for its consideration in this matter.

Respectfully submitted,

Alan H. Scheiner /s/

Alan H. Scheiner

Senior Counsel

cc (via ECF): All Counsel